

**BEFORE THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

DOCKET NO. 2020-125-E

Application of Dominion Energy South)	<u>UNITED STATES DEPARTMENT</u>
Carolina, Inc. for Adjustment of)	<u>OF DEFENSE AND ALL OTHER</u>
Rates and Charges (See Commission)	<u>FEDERAL EXECUTIVE</u>
Order No. 2020-13))	<u>AGENCIES' SECOND SET OF</u>
)	<u>WRITTEN INTERROGATORIES</u>
)	<u>AND REQUEST FOR</u>
)	<u>PRODUCTION OF DOCUMENTS</u>
)	<u>AND THINGS TO DOMINION</u>
)	<u>ENERGY SOUTH CAROLINA, INC.</u>

Pursuant to the Public Service Commission's Regulation 103-833, the United States Department of Defense and all other Federal Executive Agencies ("DoD/FEA"), by and through its legal counsel, hereby submits its Second Set of Written Interrogatories and Request for Production of Documents and Things to Dominion Energy South Carolina, Inc.

INSTRUCTIONS

1. Responses to these request should be provided within 20 days of this request in writing and under oath.
2. These Requests are continuing in nature and require supplemental answers within a reasonable time if additional documents or information would be responsive to these Requests.

3. If any of the responses do not contain complete information, so state this and identify each person who may have the additional information.

4. Due to mandated teleworking due to COVID-19, please deliver responses electronically to emilcy.w.medlyn.civ@mail.mil.

DEFINITIONS

1. “Company” is defined as Dominion Energy South Carolina, Inc.

2. “DESC” is defined as Dominion Energy South Carolina, Inc.

3. “DE” is defined as Dominion Energy

4. “Document” and “workpaper” shall have the broadest possible meaning and include, without limitation, the original and any non-identical copy (whether different from the original because of handwritten notes, underlining, or other marks,) regardless of origin or location, of written, typed, printed, or graphic matter (however produced or reproduced), and electrical or magnetic sound or video recordings, or transcriptions thereof, file or photographic prints, and all other writings or recordings of every kind and description, including, but not limited to, papers, letters, correspondence, agreements, contracts, telegrams, notes, notations, computer printouts, digital or e-mail communications, text messaging, data sheets, data processing cards or tapes, memoranda (including memoranda or memorials of conversations or meetings), intra-office communications, notebooks, reports, articles, books, pamphlets, periodicals, tables, charts, graphs, blueprints, drawings, studies, worksheets, estimating sheets, bids, bills, time cards, indices, lists, surveys, diaries, diary entries, facsimiles, specimens, models, schedules, accounts, invoices, purchase orders, estimates, ledgers, audits, and indices, and drafts, revisions or amendments of any of the above, and generally, any kind of tangible, permanent records that are now, or

formerly were, in your possession, custody or control, or that were known by you to exist, and that can be located or discovered by reasonably diligent efforts.

5. “Identify” or “identity,” when referring to a natural person, shall mean to provide without limitation his or her full name, present or last-known address, telephone number, present or last-known business affiliation and location, and job titles and responsibilities during the applicable time covered by any response referring to such person.

6. “Identify” or “identity,” when referring to a document or writing, shall mean to give sufficient characterization of the document or writing so as to have identified it with reasonable particularity and shall include, without limitation, the following information with respect to such document or writing:

- a. The author and the sender of the document or writing;
- b. The date appearing on the document or writing, and if it has no date, the answer shall so state but shall give the date or approximate date the document or writing was prepared;
- c. The general nature or description of the document;
- d. The name of the person or persons, if any, to whom such document or writing was addressed and the names of other persons to whom the document or copies thereof were given or sent, if any;
- e. The name and address of the person having present possession, custody, or control of the document or writing.

DOCUMENT AND INFORMATION REQUESTS

DOD/FEA-DESC No. 2-1. Please provide all property data utilized in the depreciation study, including, but not limited to, additions, retirements, transfers, sales, adjustments, cost of removal, and salvage data.

- a. Please provide this data by account, placement, and experience year since the date of inception.
- b. Please provide all survivors for each account as of the study date.
- c. Please include all transaction codes and a description of each transaction code.
- d. Please also provide a description of any production unit / group / location codes if applicable.
- e. This data should allow for the reconstruction of the analysis and calculations performed as part of the depreciation study.
- f. Please provide this information in Excel format with formulae intact where applicable.

DOD/FEA-DESC No. 2-2. Please provide all workpapers, schedules, tables, and exhibits used in the depreciation study or relied upon in conducting the depreciation study in Excel format with formulae intact where applicable.

DOD/FEA-DESC No. 2-3. Please provide all final observed life tables generated for each account in Excel format.

DOD/FEA-DESC No. 2-4. Please provide all remaining life calculations in Excel format.

DOD/FEA-DESC No. 2-5. Please provide the average age of survivors as of the study date for each production plant by account.

DOD/FEA-DESC No. 2-6. Please provide the book reserve (accumulated depreciation) balances for each account as of the depreciation study date.

DOD/FEA-DESC No. 2-7. Please identify and describe any changes in the depreciation system / methodology between the previous depreciation study and the depreciation study filed in this case.

DOD/FEA-DESC No. 2-8. Please provide a schedule showing the currently-approved and proposed survivor curves, net salvage rates, and depreciation rates, and depreciation accrual for each account.

DOD/FEA-DESC No. 2-9. Please provide a copy of the most recent, previously-filed depreciation study.

DOD/FEA-DESC No. 2-10. Please provide a copy of the most recent Commission order(s) regarding currently-approved depreciation rates and probable retirement dates of any production units.

DOD/FEA-DESC No. 2-11. Please provide a copy of the Company's most recently-filed integrated resource plan; please also provide a copy of the most recently prepared integrated resource plan.

DOD/FEA-DESC No. 2-12. Please provide all notes taken during any meetings with Company personnel regarding the depreciation study. Identify by name and title, all Company personnel who provided the information, and explain the extent of their participation and the information they provided. Please explain how this information affected the depreciation study.

DOD/FEA-DESC No. 2-13. Please identify all plant tours taken in relation to the depreciation study. For each such tour:

- a. Identify those in attendance and their titles and job descriptions.
- b. Provide all conversation notes taken during the tour.
- c. Provide all photographs and images taken during the tour.
- d. Provide all written materials obtained during the tour.

DOD/FEA-DESC No. 2-14. Please specifically identify and describe any information obtained from any plant tour, field trip, or discussion with Company personnel, that would indicate that the average service lives of any life span or mass property would be shorter or longer than what is indicated by the retirement rate described by the Company's plant data.

DOD/FEA-DESC No. 2-15. Please provide all external sources relied upon in conducting the depreciation study, including industry surveys, statistics, and reports.

DOD/FEA-DESC No. 2-16. Please provide a copy of the most recent industry surveys associated with depreciation statistics.

DOD/FEA-DESC No. 2-17. Please identify and provide a copy of the Company's accounting policies and procedures for plant retirements and cost of removal.

DOD/FEA-DESC No. 2-18. Please identify and provide copies of Company programs and plans that might substantially affect the remaining lives of any plant assets.

DOD/FEA-DESC No. 2-19. Regarding the placement and experience bands chosen for the analysis of each account, please explain why such bands were chosen and if any other bands were considered for conducting depreciation analysis.

DOD/FEA-DESC No. 2-20. Please provide copies of any internal memos, policies, studies, etc., identifying the appropriate allocation or treatment of costs between cost of removal and the installation of new investment when a retirement occurs and a replacement investment is installed at the same location. Further, provide all support, justification and related documents associated with establishing the allocation levels.

DOD/FEA-DESC No. 2-21. Please identify and provide copies of all Board of Director's minutes and internal management meeting minutes in which the subject of the Company's depreciation rates or the probable retirement dates of the Company's production units were discussed during the last three calendar years.

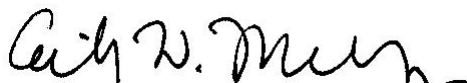
DOD/FEA-DESC No. 2-22. Please provide the updated plant balances to which the approved depreciation rates in this case will be applied.

DOD/FEA-DESC No. 2-23. Please state whether the recorded vintage years of retirement have been modified in the historical data used to conduct the depreciation study. If so, please specifically identify such modifications by account, and provide all justification and support for the same.

DOD/FEA-DESC No. 2-24. Please provide all decommissioning studies relied upon for support of any terminal net salvage requested in this case, and provide a schedule showing the calculations of how the estimated decommissioning costs affected the proposed production net salvage rates.

DOD/FEA-DESC No. 2-25. Referring to Table 1 of the Depreciation Study (pp. VI-4 – VI-10), please provide all justification and support for the proposed net salvage rates for the Company's production plants.

Respectfully submitted,

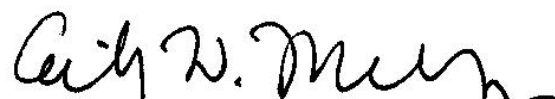


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October 7, 2020

CERTIFICATE OF SERVICE

I, Emily W. Medlyn, hereby certify that the foregoing document was served on all persons at the addresses listed in the Official Service List for Docket 2020-125-E on October 7, 2020.

A handwritten signature in black ink, appearing to read "Emily W. Medlyn", written over a horizontal line.

Emily W. Medlyn